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June 10, 2013

Via Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

RE: Correction of Sorenson's Reply Comments: CG Docket Nos. 10-51 and 03-123

Dear Ms. Dortch:

In its June 7, 2013 Reply Comments, Sorenson Communications, Inc. ("Sorenson") erroneously states that Video Relay Service providers have "never offered expert testimony or evidence" that tiers are necessary to reflect "economies of scale."¹ That is incorrect, CSDVRS, LLC's ("ZVRS") Comments to the Commission's October 2012 Public Notice was one of a number of occasions where ZVRS provided the Commission a detailed analyses of provider data to evince that economies of scale exist and must be reflected in tiered rate to achieve a competitive market.² Further, contrary to Sorenson's representation, the record reflects that Steven E. Turner provided expert testimony that the VRS industry is characterized by significant economies of scale in VRS which refuted Sorenson consultant Michael L. Katz; ZVRS endorsed for the record Mr. Turner's expert analyses and evidence in support of the tiered rate structure.³

Although the release of the related Commission TRS Order is expected to be imminent, ZVRS considers it nevertheless important to ensure that the Commission is accurately informed about its record of VRS proceedings.

¹ Reply Comments of Sorenson Communications, Inc., and CaptionCall LLC at 9, CG Docket Nos. 03-123, 10-51 (filed June 7, 2013).

² Comments of CSDVRS, LLC at 9-11, CG Docket Nos. 10-51 and 03-123 (November 14, 2012).

³ Reply Comments of CSDVRS, LLC at 5, CG Docket Nos. 10-51 and 03-123 (November 29, 2012), *citing* Comments of Purple Communications, Inc., CG Docket Nos. 10-51 and 03-123, Report of Steven E. Turner, Addendum A (November 14, 2012).

Sincerely,

/s/

Jeff Rosen
General Counsel

cc: Diane Mason
Karen Peltz Strauss
Gregory Hlibok